



THE CITY OF NEW YORK  
LAW DEPARTMENT

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May 5, 2022

**By ECF**

Hon. Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Ronisha Ferguson v. The City of New York, et al.*, 22-cv-01000 (KPF)(VF)

Dear Judge Failla:

I am the Assistant Corporation Counsel in the Office of the Corporation Counsel assigned to represent the City of New York (City) in the above-referenced case wherein Plaintiff Ferguson alleges she was subject to an unreasonable search and her children were wrongfully removed. I write to request a 30-day extension of the City's time to identify the remaining John Doe Defendants, from May 9, 2022 to June 8, 2022. As noted in the City's March 8, 2022 letter (ECF No. 20) the City has already identified one of the John Doe Defendants. Plaintiffs consent to this request on the condition that such consent will not be used against them if there is a dispute regarding the statute of limitations (and Defendants consent to this request). This is the City's first request for an extension of time to identify the John Doe Defendants.<sup>1</sup>

Thank you for consideration of this request.

Respectfully submitted,

s/  
Sharon Sprayregen

cc. by ECF  
Plaintiffs' counsel

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<sup>1</sup> In response to the Plaintiffs' letter requesting that the City be required to identify the John Doe defendants, the City proposed a 60-day time frame to respond. The City does not interpret that proposal as an extension request.